

1 MELANIE A. HILL, ESQ.
Nevada Bar No. 8796
2 **MELANIE HILL LAW PLLC**
520 S. 7th Street, Suite A
3 Las Vegas, NV 89101
Tel: (702) 362-8500
4 Fax: (702) 362-8505
Melanie@MelanieHillLaw.com
5 *Attorney for Plaintiff Pamela Dittmar*

6
7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 *****

10 PAMELA DITTMAR,

11 Plaintiff,

12 v.

13 CITY OF NORTH LAS VEGAS, a municipal
14 corporation,

15 Defendant.

Case No. 2:17-cv-02916-JAD-PAL

**STIPULATION FOR BRIEFING
SCHEDULE ON DEPOSITIONS OF
MAYOR JOHN LEE AND RYANN
JUDEN**

16 Counsel for Plaintiff, Melanie A. Hill of Melanie Hill Law PLLC, and counsel for Defendant,
17 R. Todd Creer and Kaitlin H. Paxton of the law firm of Kamer Zucker Abbott, respectfully submit
18 the following stipulation for briefing schedule on the depositions of Mayor John Lee and Ryann
19 Juden. The parties make this joint request to brief the taking of the depositions of Mayor John Lee
20 and Ryann Juden. On February 28, 2019, after deposing the former North Las Vegas City Manager,
21 Dr. Qiong Liu the afternoon of February 26, 2019, counsel for Plaintiff noticed up the deposition of
22 the North Las Vegas City Manager Ryann Juden for March 14, 2019 at 9:30am and noticed up the
23 deposition of the North Las Vegas Mayor John Lee for March 15, 2019 at 9:30am.

24 The parties met and conferred on multiple occasions on the depositions when counsel for
25 Plaintiff was requesting available dates to set the depositions and after the depositions were set.
26 During their meet and confer discussion, the parties discussed their positions as to why the
27 depositions would or would not be appropriate. While the parties discussed these issues in good
28 faith, they were not able to resolve their differences and now seek the assistance of the Court.

1 Defendant City of North Las Vegas intended on filing a Motion for Protective Order to prevent both
2 depositions from going forward and Plaintiff intended on filing a Motion to Compel the Depositions.

3 To avoid the filing of dueling motions on the same issue, counsel for Plaintiff then proposed
4 that the parties agree to file simultaneous opening and responding briefs with no replies and leave it
5 up to the Court whether or not to set a hearing on the opening briefs and allow any reply to be heard
6 orally at any hearing, if set. The parties have agreed that these depositions will not go forward until
7 the Court rules on the opening briefs.

8 **IT IS HEREBY STIPULATED AND AGREED** between the parties that the following
9 expedited briefing schedule be entered:

10 (1) Within three (3) business days of the entry of this Stipulation and Order, the parties shall
11 simultaneously file opening briefs on the issue of taking the depositions of the North Las
12 Vegas City Manager Ryann Juden and North Las Vegas Mayor John Lee.

13 (2) Seven (7) calendar days after the filing of the opening briefs, the parties shall
14 simultaneously file responding briefs addressing the arguments raised in the opposing
15 parties' opening brief.

16 (3) No replies shall be filed and the issue will stand fully briefed once the responding briefs
17 are filed with the Court.

18 DATED this 12th day of March, 2019.

19 MELANIE HILL LAW PLLC

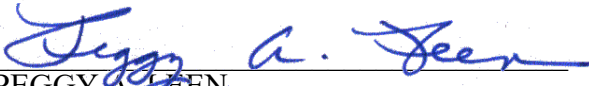
KAMER ZUCKER ABBOTT

20 By: /s/ Melanie A. Hill
21 Melanie A. Hill, Esq.
22 NV Bar No. 8796
23 520 S. 7th Street, Suite A
24 Las Vegas, Nevada 89101
25 Telephone: (702) 362-8500
26 Facsimile: (702) 362-8505
27 Melanie@MelanieHillLaw.com
28 *Attorneys for Plaintiff Pamela Dittmar*

By: /s/ R. Todd Creer
R. Todd Creer, Esq.
NV Bar No. 10016
3000 West Charleston Blvd., Suite 3
Las Vegas, Nevada 89102
Telephone: (702) 259-8640
Facsimile: (702) 259-8646
tcreer@kzalaw.com
Attorneys for Defendant City of NLV

IT IS SO ORDERED.

Dated this 14th day of March, 2019.


PEGGY A. LEEN
UNITED STATES MAGISTRATE JUDGE